



5. LoanCare requests an extension of time to continue investigating the facts and allegations raised in the Class Action Complaint and to prepare an appropriate response to the Class Action Complaint. LoanCare respectfully submits that the foregoing circumstances constitute good cause and warrant granting the extension requested.

6. The requested extension is made in good faith and not for the purpose of delay, and no party will be prejudiced by this extension.

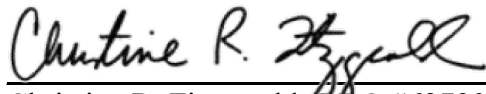
WHEREFORE, Defendant LoanCare, LLC requests entry of an order granting it an extension of time of up to and including May 25, 2022, within which to respond to the Class Action Complaint.

Local Rule 7.01(a)(2) Certification

As required by Local Rule 7.01(a)(2), counsel for LoanCare has conferred with counsel for Plaintiff, who has advised that Plaintiff does not oppose the requested extension of time.

Date: April 22, 2022

Respectfully submitted,

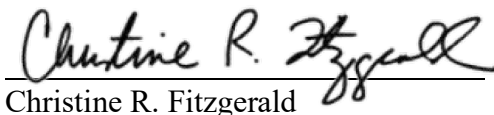


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*Counsel for LoanCare, LLC*

**CERTIFICATE OF SERVICE**

I certify that on April 22, 2022, the foregoing was electronically filed with this Court's CM/ECF System and thereby served on counsel of record.



Christine R. Fitzgerald